

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

TEXAS HEALTH AND HUMAN SERVICES )  
COMMISSION, )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 3:15-cv-03851-N  
  )  
UNITED STATES OF AMERICA, et al., )  
  )  
  Defendants. )  
  )  
  )

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**DEFENDANT INTERNATIONAL RESCUE COMMITTEE'S  
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Defendant International Rescue Committee (IRC), by and through its counsel of record, hereby moves this court for dismissal of Plaintiff Texas Health and Human Services Commission's (HHSC's) amended complaint [Doc. 13]. The Court should dismiss HHSC's claim against IRC for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6). This motion is supported by the brief also filed on this date.

Dated: January 4, 2016

Respectfully submitted,

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\*\*Application for admission *pro hac vice* forthcoming

**CERTIFICATE OF SERVICE**

I hereby certify the foregoing motion to dismiss was served upon the parties via ECF notification.

/s/ Cecilia D. Wang  
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